

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OKLAHOMA

NANCY R., pseudonymously,

Plaintiff,

vs.

PLAZA HOTELS LLC, et al.,

Defendants.

Case No.: 5:25-cv-00462-G

**PLAINTIFF'S MOTION FOR *PRO HAC VICE* ADMISSION  
OF MICHAEL C. KANE**

Plaintiff, Nancy R., by her undersigned attorney in the above-captioned matter respectfully moves the Court to admit non-resident attorney Michael C. Kane, *pro hac vice*, to appear in and participate as counsel or co-counsel in this case with Fletcher D. Handley, Jr., OBA No. 3797 with the law firm of Handley Fletcher Center. In support of this Motion, Plaintiff Nancy R. states as follows:

1. Michael C. Kane is an attorney with The702Firm located at 8335 West Flamingo Road, Las Vegas, NV 89147.
2. The undersigned, Fletcher D. Handley, Jr., certifies that Michael C. Kane is a member of the bar in good standing of the highest court of the State of Nevada. Michael C. Kane has not been disciplined in any jurisdiction and has not resigned or been placed on inactive status as a member of any bar.
3. Attached to this Motion is a Request for Admission *Pro Hac Vice*, completed and signed by Michael C. Kane.
4. Michael C. Kane understands that he must register for electronic filing (ECF) with this Court promptly upon granting this Motion and upon activation,

electronically file an Entry of Appearance consistent with LCvR 83.4.

5. A Proposed Order granting this Motion is submitted herewith.

6. This Motion is accompanied by the required \$100.00 fee.

WHEREFORE, Plaintiff Nancy R. respectfully requests the Court grant this Motion and enter an Order in the form attached admitting Michael C. Kane *pro hac vice* to represent Plaintiff in this case and in all proceedings attendant thereto.

Dated, May 12<sup>th</sup>, 2025.

/s/ Fletcher D. Handley, Jr.  
FLETCHER D. HANDLEY, JR.  
OBA No. 3797  
Handley Law Center  
PO Box 310  
El Reno, OK 73036  
Tel: (405) 295-1924  
Email: fdh@handleylaw.com

*Attorney for Plaintiff Nancy R.*

## Certificate of Service

The undersign certifies that on the 20<sup>th</sup> day of May, 2025 he electronically transmitted a true and correct copy of the within and foregoing to all parties' counsel as outlined further below, in accordance with the Federal Rules of Civil Procedure:

|  |  |
|--|--|
| <p>Abby R. Herren<br/>Bart Jay Robey<br/>Eric A. Moen<br/>CHUBBUCK DUNCAN &amp; ROBEY, PC<br/>1329 Classen Drive<br/>Oklahoma City, OK 73103<br/><i>Attorney for Defendant,</i><br/><i>OKC Airport ES, LLC</i></p>   | <p>David Senger<br/>Hunter Siex<br/>COFFEY, SENGER &amp; WOODARD, PLLC<br/>4725 East 91st Street, Suite 100<br/>Tulsa, Oklahoma 74137<br/><i>Attorneys for Defendant,</i><br/><i>Jaliyan Hospitality, Inc.</i></p>   |
| <p>Charles D Neal, Jr<br/>Steidley &amp; Neal-MCALESTER<br/>P O Box 1165<br/>100 E Carl Albert Parkway<br/>McAlester, OK 74502</p> <p>Jamie A Rogers<br/>Philard L Rounds, Jr<br/>Steidley &amp; Neal, PLLC - Tulsa<br/>2448 E 81st 53rd Floor<br/>Ste 5300<br/>Tulsa, OK 74137</p> <p>Christopher T. Byrd<br/>Patrick B. Moore<br/>Shubhra R. Mashelkar<br/>WEINBERG, WHEELER, HUDGINS,<br/>GUNN &amp; DIAL<br/>3344 Peachtree Road. NE, Suite 2400<br/>Atlanta, Georgia 30326<br/><i>Attorneys for Defendant,</i><br/><i>ESH Strategies Franchise, LLC</i></p> | <p>Kaylee P. Davis-Maddy<br/>Michael S. Linscott<br/>DOERNER SANDERS DANIEL &amp; ANDERSON<br/>210 Park Avenue, Suite 1200<br/>Oklahoma City, OK 73102<br/><i>Attorneys for Defendants,</i><br/><i>Super 8 Worldwide LLC,</i><br/><i>Days Inn Worldwide, Inc.,</i><br/><i>Ramada Worldwide, Inc.</i><br/><i>Howard Johnson International, Inc.</i></p> |
| <p>Alexander Gebert<br/>Robert Glenn Chadwick, Jr.<br/>FREEMAN MATHIS &amp; GARY, LLP<br/>7160 Dallas Parkway, Suite 625<br/>Plano, Texas 75024<br/><i>Attorneys for Defendant,</i><br/><i>Raj Krupa Hotel, LLC</i></p>  | <p>Jonathan Wilfong<br/>Oyo Hotels, Inc.<br/>440 Louisiana Street, Suite 105<br/>Houston, TX 770062<br/><i>Attorney for Defendant,</i><br/><i>G6 Hospitality Franchising, LLC</i></p>  |

|   |   |
|---|---|
| Steve Ketter<br>5101 S. Choctaw Avenue<br>El Reno, OK 73036                                       | Kajal Hospitality, LLC<br>c/o Jaydip Modi<br>1120 S. 10th Street<br>Clinton, OK 73601             |
| Chand & Saaj Hospitality, Inc.<br>c/o Hitesh Patel<br>2200 S. Meridian<br>Oklahoma City, OK 73108 | Noor Hotel, LLC<br>c/o Abdel Jawabreh<br>3213 Meadow Lane<br>Edmond, OK 73103                     |
| Yash Enterprises, Inc.<br>c/o Tushar Natha<br>400 S. Meridian<br>Oklahoma City, OK 73108          | Ambica, LLC<br>c/o Prakash Patel<br>5608 N.W. 107 <sup>th</sup> Street<br>Oklahoma City, OK 73162 |
| OM, LLC<br>c/o Ramesh V. Patel<br>12001 N. I-35 Service Road<br>Oklahoma City, OK 73131           | Indra, LLC<br>c/o Ramesh Patel<br>11935 N. I-35 Service Road<br>Oklahoma City, OK 73131           |
| Plaza Hotels, LLC<br>3200 S. I-35 Service Road<br>Oklahoma City, OK 73129                         | Michael Wiley<br>11025 N. County Line Road<br>Yukon, OK 73099                                     |

/s/ Fletcher D. Handley, Jr.

Fletcher D. Handley, Jr.

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

Nancy R., pseudonymously

vs.

Plaza Hotels LLC et al.

Plaintiff(s)

Defendant(s)

Case No. 5:25-cv-00462-G

**REQUEST FOR ADMISSION PRO HAC VICE**

I hereby request admission to the Bar of this Court PRO HAC VICE in support of which I represent that the answers to the following questions are complete, true and correct:

1. Full name: Michael C. Kane
2. State bar membership number: Nevada Bar # 10096
3. Business address, telephone and fax numbers:  
The702Firm  
8335 W. Flamingo Road, Las Vegas, NV 89147  
Tel: 702-776-3333 Fax: 702-505-9787
4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:  
Nevada Supreme Court  
U.S. District Court for the District of Nevada
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? ☐ Yes ☒ No
6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? ☐ Yes ☒ No  
(Please attach a statement explaining any "YES" answers to questions 5 or 6.)
7. Are you familiar with the Federal Rules of Evidence, the Federal Rules of Civil or Criminal Procedure (as applicable to this case) and the local rules of this court? ☒ Yes ☐ No

A check for \$100 should be made payable to the U.S. District Court Clerk.  
(United States Government Attorneys are exempted from paying this fee.)

DATED this 20th day of May 2025.

/s/ Michael C. Kane

Signature of Applicant

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE STATE OF NEVADA**

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*I, Elizabeth A. Brown, Clerk of the Supreme Court of the State of Nevada, do hereby certify that MICHAEL KANE (Bar No.10096) was on the 17<sup>TH</sup> day of OCTOBER, 2006 duly admitted as an attorney and counselor at law to practice in all the courts of the State of Nevada; and that the Supreme Court of Nevada is the highest court in this state;*

*I FURTHER CERTIFY that the said that MICHAEL KANE in good standing; and that his name now appears on the Roll of Attorneys in this office.*



IN TESTIMONY WHEREOF, I HAVE HEREUNTO SET MY HAND AND  
AFFIXED THE OFFICIAL SEAL OF SAID SUPREME COURT, AT MY  
OFFICE IN CARSON CITY, NEVADA, THIS 12<sup>TH</sup> DAY OF MAY, 2025.

ELIZABETH A. BROWN, CLERK  
SUPREME COURT  
STATE OF NEVADA

  
Chief Deputy Clerk



SUPREME COURT OF NEVADA  
OFFICE OF THE CLERK  
ELIZABETH A. BROWN, CLERK  
201 SOUTH CARSON STREET, SUITE 201  
CARSON CITY, NEVADA 89701-4702

Telephone  
(775) 684-1600

May 12, 2025

Michael Kane  
The702Firm Injury Attorneys  
8335 W. Flamingo Road  
Las Vegas, NV 89147

Re: Certificate of Good Standing

Dear Michael Kane:

Pursuant to your request, enclosed is a certificate of admission and good standing in the State Bar of Nevada.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Wunsch", is written over the typed name.

Rory Wunsch  
Chief Deputy Clerk

AA  
Enclosure

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vs.

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Defendants.

Case No.: 5:25-cv-00462-G

**PROPOSED ORDER**

Plaintiff, Nancy R., moves to admit Michael C. Kane *pro hac vice*. See Doc. \_\_\_\_\_. For good cause shown, the Court GRANTS this motion. Michael C. Kane is admitted to practice before this Court for the limited purpose of participating in this case, provided that Kane link his individual PACER accounts to this Court in order to request e-filing access and then electronically file his entries of appearance, consistent with LCvR83.4. The attorney should familiarize himself with this District's Local Rules and this Court's Chamber Rules.

IT IS SO ORDERED this \_\_\_\_<sup>th</sup> day of \_\_\_\_\_, 2025.

X

Charles Goodwin  
United States District Judge